

Exhibit A

IN THE CIRCUIT COURT FOR ROANE COUNTY, TENNESSEE

LOUIS G. JONES, JR.,

Plaintiff,

v.

FORD MOTOR COMPANY,
c/o Registered Agent, CT Corporation
300 Montvue Road
Knoxville, Tennessee 37919-5546

Defendant.

Docket No.: 2022-CV-105
Jury Demanded

SUMMONS

To the above-named defendant: **FORD MOTOR COMPANY,
c/o Registered Agent
CT Corporation
300 Montvue Road
Knoxville, Tennessee 37919-5546**

You are hereby summoned and required to serve upon Ronald T. Hill, Esq., plaintiff's attorney, whose address is Egerton, McAfee, Armistead & Davis, P.C., 900 S. Gay Street, 14th Floor, Knoxville, Tennessee 37902, an answer to the complaint herewith served upon you within 30 days after service of this summons and complaint upon you, exclusive of the day of service. A copy of the answer must be filed with the court either before or within a reasonable time after service. If you fail to do so, judgment by default can be taken against you for the relief demanded in the complaint.

Issued and attested this the 31st day of August, 2022.

Ann Goldston
Clerk

Amy Brown
Deputy Clerk

NOTICE

To the defendant **FORD MOTOR COMPANY**:

Tennessee law provides a Ten Thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek counsel of a lawyer.

SERVICE INFORMATION

To the process server: Defendant **FORD MOTOR COMPANY** can be served at:

**c/o Registered Agent
CT Corporation
300 Montvue Road
Knoxville, Tennessee 37919-5546**

RETURN

I received this summons on the _____ day of _____, 2022.

I hereby certify and return that on the _____ day of _____, 2022 that I:

☐ served this summons and complaint on the defendant **FORD MOTOR COMPANY** in the following manner:

☐ failed to serve this summons within 30 days after its issuance because: _____

Process Server (*Required to be filled out by Process Server*)

Name (*please print*): _____

Address: _____

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System
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COMPLAINT

Comes now the Plaintiff, Louis G. Jones, Jr., by the undersigned counsel, and states as follows for his Complaint against Ford Motor Company.

1. Plaintiff, Louis G. Jones, Jr. ("Mr. Jones"), by the undersigned counsel, is a citizen and resident of Kingston, Roane County, Tennessee, residing at 173 Island Road, Kingston, Tennessee 37763.

2. Defendant, Ford Motor Company, is a Delaware corporation authorized to do business and actually doing business in the state of Tennessee. The principal office of Ford Motor Company is 1 American Road, Dearborn, Michigan 48126-2701. Ford Motor Company may be served with process through its Registered Agent, CT Corporation System, 300 Montvue Road, Knoxville, Tennessee 37919-5546.

3. Ford Motor Company is the manufacturer of the 2016 Ford F250 truck bearing VIN 1FT7W2BT4GEA95529.

4. This is an action for personal injuries and damages resulting from a defective or unreasonably dangerous product, a 2016 Ford F250 truck, designed, manufactured, sold and/or

Filed
ANN GOLDSTON Time 2010
8-31-2022
BY Ann Brown D.C.

distributed by the Defendant, Ford Motor Company. The injuries and damages suffered by Mr. Jones arose from an event described in this Complaint which occurred in Kingston, Roane County, Tennessee on July 26, 2019.

5. Jurisdiction and venue are proper in this court as the event described in this Complaint occurred in Roane County, Tennessee, and all parties are subject to the jurisdiction of this court.

6. This action is filed within one year of the September 9, 2021, entry of a Stipulation of Dismissal without prejudice in the United States District Court for the Eastern District of Tennessee in a prior action filed in connection with the same event at issue in this action.

7. On July 26, 2019, Mr. Jones was entering his 2016 Ford F250 truck (VIN 1FT7W2BT4GEA95529), which was parked at his residence identified above. As Mr. Jones was entering his truck, and while holding onto the driver's side front grab handle with his left hand, the grab handle suddenly and without warning failed and detached from the truck. Mr. Jones began falling, and although he was in a twisting motion while falling, he managed to slow his fall by the steering wheel and the driver's seat bottom. That prevented Mr. Jones from falling completely to the ground. However, it did not prevent Mr. Jones from twisting as he was falling or from striking his back against the door frame between the front and back doors.

8. Mr. Jones is the owner of the 2016 Ford F250 truck identified above, having purchased the truck from Lance Cunningham Ford in Knoxville, Tennessee, in 2016. At the time of the event which is the subject of this action the truck and grab handle were in substantially the same condition as when they left the manufacturer, Ford Motor Company, except for normal wear and tear.

9. At all-time materials to this action, the truck and grab handle were in a defective or unreasonably dangerous condition, rendering them unsafe for normal use.

10. The truck and grab handle were negligently or defectively designed, manufactured, assembled, and tested by Ford Motor Company in that the truck and grab handle were not properly designed, manufactured, assembled, or tested in such a manner to perform as they should. Rather, this failure occurred suddenly and without warning as Mr. Jones was using the truck and grab handle as they were intended to be used.

11. The truck and grab handle were also defective or unreasonably dangerous in that Ford Motor Company failed to adequately warn owners, operators, and users of the truck and failed to issue proper instructions or warnings about the dangers presented by the defective or unreasonably dangerous truck and grab handle.

12. Further, Ford Motor Company negligently tested or failed to adequately test the truck or the grab handle, or a substantially similar truck and grab handle, and/or failed to exercise reasonable care in the testing of the truck and grab handle, and as a result failed to incorporate adequate safety devices and designs to make the truck and grab handle reasonably safe for their intended and foreseeable use.

13. Ford Motor Company breached warranties, both expressed and implied, as stated in Tenn. Code Ann. §§47-2-313, 47-2-314, 47-2-315, including a warranty of fitness for a particular purpose. The truck was intended to be used as Mr. Jones was using it. The grab handle on the truck was intended to be used as Mr. Jones or any person would do while entering the truck.

14. As a direct and proximate result of the unreasonably dangerous or defective condition of the truck and grab handle as stated in this Complaint, and Ford Motor Company's negligence and breach of warranties, Mr. Jones sustained multiple, severe, and permanent injuries, requiring him to undergo multiple surgeries and ongoing medical treatment.

15. As a direct and proximate result of the unreasonably dangerous or defective condition of the truck and grab handle as stated in this Complaint, and Ford Motor Company's negligence and breach of warranties, Mr. Jones sustained injuries and damages including the following:

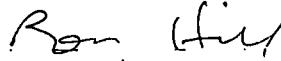
- a. Serious and permanent injuries to spinal discs;
- b. Serious and permanent spinal stenosis;
- c. Physical and mental pain and suffering, both temporary in nature and reasonably certain to be permanent;
- d. Loss of capacity for the enjoyment of life, both temporary in nature and reasonably certain to be permanent;
- e. Reasonable and necessary expenses for medical care, services, and supplies, both current expenses and reasonably certain future expenses;
- f. Loss of earning capacity, both current and reasonably certain to be lost in the future;
- g. Damages to his truck to remedy the grab handle that failed and other grab handles on the truck.

16. In the alternative, the injuries suffered by Mr. Jones constitute aggravation of preexisting conditions of Mr. Jones that would not have occurred without the event set forth in this Complaint.

WHEREFORE, Louis G. Jones, Jr. demands judgment against Ford Motor Company in the amount of Three Million Five Hundred Thousand Dollars (\$3,500,000.00) for compensatory damages or in such amount determined by the jury as fair and reasonable compensation. Mr. Jones also demands judgment for the costs of this action and discretionary costs in accordance with the

Tennessee Rules of Civil Procedure. Mr. Jones also requests such additional general relief to which he is entitled under the circumstances. A jury is demanded to try all issues triable by a jury.

RESPECTFULLY SUBMITTED this 31st day of August, 2022.




Ronald T. Hill, Esq., BPR# 01183
EGERTON, McAFEE, ARMISTEAD & DAVIS, P.C.
P.O. Box 2047
Knoxville, Tennessee 37901
(865) 546-0500
Attorney for Louis G. Jones, Jr.

COST BOND

This is to certify that the undersigned is surety for principal, Louis G. Jones, Jr., in this cause pursuant to T.C.A. §20-12-120.

EGERTON, McAFEE, ARMISTEAD
& DAVIS, P.C.

By: 

Ronald T. Hill, Esq.
Surety